REMARKS

Claims 1-5 and 7-23 are presently pending, of which claims 1, 12 and 23 are independent. Claims 1, 12 and 23 have been amended for clarity and not to address any art rejection. Specification has been amended to delete the language "or in a propagated signal." No new matter has been added. Applicant believes that the claims are patentable and in condition for allowance as discussed below. Applicant respectfully requests reconsideration of the outstanding rejections in view of the comments set forth below.

I. Claim Rejections

Claim 23 has been rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter.

Claims 1-7, 10, 12-17, 21 and 23 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Number 6,957,191 to Belcsak et al (hereafter "Belcsak"), or in the alternative, under 35 U.S.C. §103(a) as being obvious over or Belcsak in view of U.S. Patent Number 6,763,497 to Softky (hereafter "Softky").

Claims 8-9, 11, 18-20 and 22 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Belcsak in view of U.S. Patent Number 6,339,838 to Weinman (hereafter "Weinman").

II. Claim Rejections under 35 U.S.C. §101

Claim 23 has been rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter (Office Action, page 2, § 3). More particularly, the Examiner stated that the claimed computer-program product includes intangible media such as a "propagated signal" because of one implementation discussed in the specification and that the claim was therefore directed to non-statutory subject matter. Applicant respectfully disagrees.

Applicant respectfully submits that claim 23 does not recite a "propagated signal." Furthermore, Applicant amends the specification to delete the language "or in a propagated signal."

Claim 23 recites "a computer program product *residing on* a *computer readable medium*." Accordingly, Applicant believes that a computer program product **residing on** a

computer readable medium is directed to statutory subject matter. *See* In re Beauregard, 53 F.3d 1583, 1583-84 (Fed. Cir. 1995). As such, Applicant respectfully requests the Examiner to reconsider and to withdraw the 35 U.S.C. §101 rejection of claim 23.

III. Claim Rejections under 35 U.S.C. §102(e)

     Claims 1-7, 10, 12-17, 21 and 23 have been rejected under 35 U.S.C. §102(e) as being anticipated by Belcsak (Office Action, page 4, § 5). Applicant respectfully traverses the rejection.

     Belcsak discusses a financial scenario modeling and analysis tool which includes a graphical user interface (GUI) which allows a user to create a model of the financial scenario (Abstract). The tool also includes an engine to automatically generate information which at least partially models a part of the financial scenario using information collected during creation of the model (Abstract).

     A. Claim 1

     Amended independent claim 1 recites:

"A method comprising:
     performing an analysis or synthesis operation on a graphical model representation that includes at least one graphical object;
     producing a report from the analysis or synthesis operation;
     generating associations associating elements of the graphical model representation with corresponding elements in the report;
     receiving a selection of a graphical object in the graphical model representation; and
     displaying elements of the report corresponding to the selected graphical object in response to the selection."

     Applicant respectfully submits that Belcsak fails to disclose or suggest **generating associations associating elements of the graphical model representation with corresponding elements in the report** and **displaying elements of the report corresponding to the selected graphical object in response to the selection.**

     The Examiner points to column 9, lines 35-67 in Belcsak as disclosing the generation of associations recited in claim 1 (Office Action, page 5). However, contrary to the Examiner's statement regarding claim 1, the cited section does not disclose or suggest

generating an association associating elements of the graphical model representation with corresponding elements in the report, as recited in claim 1. The Examiner asserts that Belcsak expressly teaches a process of the user dragging and dropping an item to create an association to a party in the lending agreement (Office Action, page 11, Response to Arguments). Applicant respectfully disagrees. Belcsak simply indicates that the user creates a model participant by dragging-and-dropping a block onto the diagram (Col. 9, lines 44-46). The drag and drop method merely enables the user to rearrange the model participant boxes (Col. 9, lines 56-57). As such, in Belcsak, the drag-and-drop is used for elements of the diagram. In contrast, claim 1 recites **generating an association associating elements of the graphical model representation with corresponding elements in the report**. Beclsak is silent about associating elements of a graphical model representation with corresponding elements in a report representing the results of an analysis or synthesis operation on the graphical model representation.

Furthermore, Belcsak does not disclose or suggest **displaying elements of the report corresponding to the selected graphical object in response to the selection**, as recited in claim 1. In Belcsak, the information generated from the graphical representation of the financial scenario is displayed on a separate window (Figures 5-12 of Belcsak). Figures 5-12 of Belcsak illustrate that a user may scroll up/down to access the entire document generated from the graphical representation. However, Belcsak does not indicate which elements of the document correspond to which elements of the graphical representation. Belcsak is silent about **displaying elements of the report corresponding to the selected graphical object in response to the selection**, as recited in claim 1.

Accordingly, for at least the reasons presented above, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1 under 35 U.S.C. § 102(e).

B. Claims 2-7 and 10

Claims 2-7 and 10 depend from independent claim 1 and, as such, incorporate all of the elements of claim 1. Accordingly claims 2-7 and 10 are allowable for at least the reasons set forth above with respect to claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 2-7 and 10 under 35 U.S.C. § 102(e).

C. Claims 12-17 and 21

Claim 12 recites:

"A system comprising:
    means for performing an analysis or synthesis operation on a graphical
model representation that includes at least one graphical object;
    means for producing a report from the analysis or synthesis operation;
    means for **generating associations associating elements of the
graphical model representation with corresponding elements in the report**;
    means for receiving a selection of a graphical object in the graphical
model representation; and
    means for **displaying elements of the report corresponding to the
selected graphical object in response to the selection.**"

In light of the arguments presented above with regard to claim 1, Applicant respectfully submits that Belcsak fails to disclose or suggest **generating associations associating elements of the graphical model representation with corresponding elements in the report** and **displaying elements of the report corresponding to the selected graphical object in response to the selection.**

Claims 13-17 and 21 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly claims 13-17 and 21 are allowable for at least the reasons set forth above with respect to claim 12. Applicant respectfully request the Examiner to reconsider and withdraw the rejection of claims 12-17 and 21 under 35 U.S.C. § 102(e).

D. Claim 23

Claim 23 recites:

"A computer program product residing on a computer readable medium having
instructions stored thereon which, when executed a processor, cause the processor
to:
    perform an analysis or synthesis operation on a graphical model
representation, the graphical model representation including at least one graphical
object;
    produce a report from the analysis or synthesis operation;
    **generate associations associating elements of the graphical model
representation with corresponding elements in the report**,
    receive a selection of a graphical object in the graphical model
representation; and
    **display elements of the report corresponding to the selected graphical
object in response to the selection.**"

In light of the arguments presented above with regard to claim 1, Applicant respectfully submits that Belcsak fails to disclose or suggest **generating associations associating elements of the graphical model representation with corresponding elements in the report** and **displaying elements of the report corresponding to the selected graphical object in response to the selection**.

Accordingly, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 23 under 35 U.S.C. § 102(e).

IV. Claim Rejections under 35 U.S.C. §103(a)

A. Claims 1-7, 10, 12-17, 21 and 23

Claims 1-7, 10, 12-17, 21 and 23 have been rejected under 35 U.S.C. §103(a) as being obvious over Belcsak in view of Softky (Office Action, page 4, § 5). Applicant respectfully traverses the rejection.

1. Claim 1

As presented above, Belcsak does not disclose or suggest **generating associations associating elements of the graphical model representation with corresponding elements in the report**. Softky fails at curing the shortcomings of Belcsak with regard to at least this claim element.

The Examiner provides an alternative interpretation of claim 1. The Examiner states that "if the limitation of receiving a selection of the graphical object in the graphical model and displaying the element in the report in response to the selection can be interpreted as the user selecting an item within a document object model where the model is displayed within a graphical interface and in response the graphical interface displays an HTML page with a nested set of windows describing the code and the response to each selection, without redirecting the user away from the page" (Office Action, page 8). The Examiner relies on the teachings of Softky for this interpretation of a portion of the claim language. Nonetheless, Softky does not

disclose or suggest **generating an association associating elements of the graphical model representation with corresponding elements in the report**, as recited in claim 1.

In Softky, the nested set of windows provides information about different layers of the document object. Softky does not concern graphical model representations. Accordingly, Applicant disagrees with the Examiner's alternative interpretation of claim 1. As Softky is silent about graphical model representations, Sofky cannot disclose or suggest **generating an association associating elements of the graphical model representation with corresponding elements in the report**, as recited in claim 1. Thus, Softky, alone or in any reasonable combination with Belcsak does not disclose or suggest each and every element of claim 1.

Accordingly, for at least the reasons presented above, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1 under 35 U.S.C. § 103(a).

2. Claims 2-7 and 10

Claims 2-7 and 10 depend from independent claim 1 and, as such, incorporate all of the elements of claim 1. Accordingly claims 2-7 and 10 are allowable for at least the reasons set forth above with respect to claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 2-7 and 10 under 35 U.S.C. § 103(a).

3. Claims 12-17 and 21

Claim 12 recites similar elements to claim 1. Specifically, claim 12 recites, among other elements, **generating associations associating elements of the graphical model representation with corresponding elements in the report**.

In light of the arguments presented above with regard to claim 1, Applicant respectfully submits that Belcsak and Softky, alone or in any reasonable combination, fail to disclose or suggest at least this claim element.

Claims 13-17 and 21 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly claims 13-17 and 21 are allowable for at least the reasons

set forth above with respect to claim 12. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 12-17 and 21 under 35 U.S.C. § 103(a).

4. Claim 23

Claim 23 recites similar elements to claim 1. Specifically, claim 23 recites, among other elements, **generating associations associating elements of the graphical model representation with corresponding elements in the report**.

In light of the arguments presented above with regard to claim 1, Applicant respectfully submits that Belcsak and Softky, alone or in any reasonable combination, fail to disclose or suggest at least this claim element. Accordingly, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 23 under 35 U.S.C. § 103(a).

B. Claims 8, 9, 11, 18-20 and 22

Claims 8, 9, 11, 18-20 and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Belcsak, or in the alternative, Belcsak in view of Softky, in further view of Weinman (Office Action, page 9, § 7). Applicant respectfully traverses the 35 U.S.C. §103(a) rejections of claims 8-9, 11, 18-20 and 22 as set forth below.

1. Claims 8, 9 and 11

Claims 8, 9 and 11 depend from claim 1 and, as such, incorporate each and every element of claim 1. As presented above, Belcsak and Softky, alone or in any reasonable combination, do not disclose or suggest **generating associations associating elements of the graphical model representation with corresponding elements in the report**, as recited in claim 1. Weinman fails at curing the shortcomings of Belcsak and Softky with respect to at least this claim element.

Weinman discusses a commonly shared data repository which maintains a formal model of a process (Abstract). A plurality of tools allows modeling an existing or proposed process, and analyzing, controlling, modifying and improving the process (Abstract). However,

Weinman is silent about **generating associations associating elements of the graphical model representation with corresponding elements in the report**, as recited in claim 1.

As mentioned above, claims 8, 9 and 11 depend from claim 1. For at least the reasons presented above, Belcsak, Softky and Weinman, alone or in any reasonable combination, fail to disclose or suggest each and every element of claims 8, 9 and 11. Accordingly, Applicant respectfully requests the Examiner reconsider and withdraw the rejection of claims 8, 9 and 11 under 35 U.S.C. § 103(a).

    2. Claims 18-20 and 22

Claims 18-20 and 22 depend from claim 12 and, as such, incorporate each and every element of claim 12. As presented above, Weinman, Belcsak and Softky, alone or in any reasonable combination, do not disclose or suggest **generating associations associating elements of the graphical model representation with corresponding elements in the report**, as recited in claim 12.

Accordingly, Applicant respectfully requests the Examiner reconsider and withdraw the rejection of claims 18-20 and 22 under 35 U.S.C. § 103(a).

CONCLUSION

In light of the above amendments and arguments, Applicant respectfully submits that all of the pending claims are in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-059RCE. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: February 28, 2008   Respectfully submitted,

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